

## Jump, Christine

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**From:** Michael Stephenson <mstephenson@cameron-cole.com>  
**Sent:** Wednesday, March 05, 2014 2:59 PM  
**To:** ahossain@kdheks.gov; Grater, Lee R; Jana, Michael J; John Cook; Jump, Christine; mkamal@kdheks.gov; smith.martin@cleanharbors.com; Tony Carmeli  
**Subject:** Meeting minutes from Feb 27 conference call - CH Wichita  
**Attachments:** 022714 Conference call meeting minutes.docx

Hello Everyone,

Attached please find the meeting minutes from our call last Thursday. We are working vigorously on the IRM work plan and schedule and will forward those to everyone once they are together or by March 21, whichever comes sooner. Please call or email if you have any questions or concerns.

Thanks,

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**Conference Call**  
**February 27, 2014 1330 Central Time**  
**Clean Harbors Wichita**

Attendees:

Clean Harbors: Martin Smith  
Lee Grater  
Lin Longshore  
Mike Jana

USEPA; Chris Jump  
John Cook

KDHE Mustafa Kamal  
Ahkter Hossain

Cameron-Cole Mike Stephenson  
Tony Carmeli

1330 – Marty Smith opened call with a summary and review of the agenda and supporting documents provided in an email by Mike Stephenson. Email contained the call agenda, and 3 figures depicting the site sampling work that has already been completed, a graphical depiction of the soil impacts and a proposed confirmation sampling grid of the impacted areas at the site. All attendees noted that the agenda and supporting documents has been received.

Purpose of the call is to update Agencies on the status of implementation of the Interim Measures at the facility. Thermal Treatment is no longer the Interim Measure to remediate the site. Based on economics, Clean Harbors has decided to excavate soils impacted with contaminants that are above the KDHE TIER II Standards. Excavation provides the best alternative to meet the 12/15/14 indemnity deadline imposed by Union Pacific. Areas to be excavated are shown in the figures provided as supporting documentation.

Marty gave a summary of ongoing closure work at the facility. The facility is currently working from both the Facility Closure and Partial Closure Plans. Presently, walls and floors in Building B and the Processing Area are being rinsed. Rinsing activities at Buildings J and D are complete.

Discussion regarding two changes to Closure Plan:

- 1) Remove Building J from Closure. Facility will keep building J operational for ongoing business activities. Some repermitting may be required depending on waste management activities that will occur on site
- 2) Add Building C and the Processing Area to the Closure Plan. Buildings will be decontaminated, demolished, disposed as required based on analytical, and soils excavated and disposed based on analytical results.

#### Discussion regarding Closure Plan and sample results to determine when Rinsate samples are clean.

KDHE is ok with using MCL values as guideline for evaluating Rinseate sample results. Values below MCL are "clean." Do not need to get concentrations below MCL in all cases

Disposition of Building debris will be based on analytical results of rinsate samples collected during building decontamination. KDHE will review rinsate results and provide Clean Harbors with a decision regarding whether the building is "clean" or not. The timing of EPA/KDHEs response will be based upon how easy the rinsate results are to interpret. Clean building rubble (concrete, asphalt, brick, rock and cinder blocks) will be used to back fill excavations per KS reg #65.3402W. Goal will be to dispose of remaining building rubble at local construction debris landfill. Disposal as hazardous material can be accommodated if necessary. Concrete that is obviously stained or chemically distressed will be disposed of at Lone Mountain.

Soil disposal will be based on analytical. Soil disposal will occur at either at Kimball Incinerator or Lone Mt Landfill. Soil with COC concentrations below Interim Action Objectives (IAOs) will be used as backfill. Mobile lab will be used during excavation as a screening tool for guiding extent of digging. Final confirmation samples to determine soil disposal and excavation limits will be collected and sent to Kansas certified laboratory for analysis. Limits of excavation will be tied to analytical from Kansas certified lab.

#### Discussion Regarding IRM Work Plan

Clean Harbors is to submit a "skeletal" interim remedial measures work plan to EPA and KDHE by March 21. The IRM plan is to include the following:

1. Summary of Phase IV analytical data
2. Changes to the Closure Plan
  - a. Eliminate MDL as basis for decision on rinsate results
  - b. Exclude Bldg J. from Closure
  - c. Include Buildings C and the Processing Area
3. Disposal Plan
  - a. Building Debris
  - b. Incinerable waste (soil)
  - c. Other hazardous waste (soil and stained concrete)
4. Schedule
5. Sampling Plans
  - a. Soil confirmation sampling
  - b. Waste characterization sampling
6. Soils Management Plan
  - a. Live load waste soil
  - b. Stockpiled waste soil
  - c. Backfill

Schedule – Requires rapid turnaround and review of Interim Measures Work Plan by EPA/KDHE.

- 1) Revised Interim Measures work plan submitted to EPA/KDHE by March 21. This plan will be a brief summary of closure activities and excavation plans.

- 2) More detailed closure plan and Interim Measures information will be prepared following approval of skeletal Interim Measures Plan. EPA/KDHE will turn this plan around within a week.
- 3) Closure of Buildings B, C, D, and Process area completed by end of March.
- 4) Building Demo to start around April 1.
- 5) Excavation to occur following building demo.

Other Notes:

1. Clean Harbors needs to have receipts to UPRR for site remediation by December 15 for reimbursement.
2. Correspondence related to closure/demo/excavation should be sent to all agency personnel listed at the top of this memo.